To: Rebecca Duff, ICF Consulting
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From: The Power Sources Manufacturers Association Energy Committee

Date: August 25, 2005

Re: Energy Star Program Requirements and Test Methodology for Battery Charging Systems

Thank you for the opportunity to comment on the drafts of these two documents furnished to us last month. These comments are submitted on behalf of the Energy Committee of the Power Sources Manufacturers Association (PSMA), representing major power supply companies and their suppliers.

We will address the two documents separately and by line number.

Program Requirements

40 and the *Note* that appears below line 49. In spite of the efforts to clarify this, it may seem a bit unclear from the language as to the inclusion or exclusion of cell phone chargers. It is clear to the reader who (as suggested) reads the EPS specification at www.energystar.gov/powersupplies, as this explicitly includes cell phone chargers. But, the second paragraph of the *Note* states that the BCS specification applies to "…products whose principal output is heat, light, or motion; and small consumer battery chargers." The phrase, "small consumer battery chargers" might be interpreted to include cell phone chargers, thus giving the manufacturer the choice of which specification to apply to the product. Perhaps this is acceptable. If not, then perhaps the sentence should end in "…small consumer battery chargers not specifically included in the External Power Supply specification." This would allow the BCS to be the "catchall" without encroaching on the EPS specification.

99. We do not understand why the duration of the measurement of Accumulated Non-Active Energy (Ea) should be so long. A 48-hour test period will sometimes be inconvenient for the manufacturer, as it would require that the test not be

started on a Thursday or Friday unless weekend-time were authorized. Perhaps this "Full Test" should be eliminated entirely, just to simplify the specification. But, perhaps there might be some reason the participants wanted this rather long test, and if so it can remain as an option. We believe the Abbreviated Method (see lines 140 and 148 of the Test Methodology) should be a sufficient test, and that it should be shortened slightly so that it can be accomplished in one 8-hour work shift. We will discuss this in more detail herein in our commentary on the Test Methodology document.

175. China seems conspicuous by its absence. Its standard voltage is 220 Vac at 50 Hz.

Test Methodology

53. If the total test time (as suggested below) is reduced to 7 hours (6 hours of maintenance followed by 1 hour of non-active time) this minimum maintenance time should be reduced to 6 hours.

93. We suggest "…voltage at 115 V +/- 1%..." be replaced with "…voltage set at the nominal value +/-1%..." to be consistent with the Program Requirements document, line 175.

98. We suggest "…frequency of 60 Hz…" be replaced with "…frequency consistent with the market(s) in which the models will be sold and promoted as ENERGY STAR qualified, within the limits of +/-1%.

140 – 142. To allow adequate time to complete the abbreviated test within an 8-hour work day, we suggest this 8-hour test be shortened to 6 hours. When this is followed by the 1-hour standby test (for a total test time of 7 hours), there will be still one hour left in the work day to start and end the test, and to process the final results. To effect this change, simply replace "…8 hours…" with "…6 hours" and replace "…the 8-hour…" with "…the 6-hour…."

We would think the manufacturers would always prefer the Abbreviated Method, and wonder why the 48-hour test should not be eliminated altogether.

We hope these suggestions are of value, and appreciate the privilege of contributing our thoughts.

Sincerely,

Tim Cassidy	Dustin Becker
PSMA Energy Committee Co-Chair	PSMA Energy Committee Co-Chair